

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

L. Lin Wood, Jr.,

Plaintiff,

v.

Brad Raffensperger, in his official capacity  
as Secretary of the State of Georgia, et al.,

Defendants.

CIVIL ACTION FILE NO.  
1:20-cv-04651-SDG

**AFFIDAVIT OF REBECCA SHORT**

Personally appeared before me, the undersigned subscribing officer, duly authorized to administer oaths, Rebecca Short, who being duly sworn, deposed and stated as follows:

1. My name is Rebecca Short. I am over 18 years of age, a citizen of the State of Georgia, suffer from no legal disabilities, and am otherwise competent to testify to the matters contained herein. I have personal knowledge of the facts here, and if called as a witness, can testify completely thereto.

2. I am a resident of and registered elector in Fulton County, Georgia. I am also an attorney and member of the State Bar of Georgia.

3. On November 15, 2020, I was present as an observer credentialed by the Democratic Party of Georgia to observe the statewide hand recount of ballots cast in the 2020 Presidential Election in Fulton County, Georgia (the “Recount”).

4. I arrived at the Georgia World Congress Center, where the Recount was held, at approximately 8:20/8:30 a.m.

5. On arrival, I had no problems accessing the space where the Recount was happening.

6. I did not observe anyone claiming that the Recount had “just finished” or was otherwise complete. To the contrary, the Recount was ongoing when I arrived and was continuing when I left at about 12:10 p.m.

7. While I was observing the Recount, there were numerous other credentialed observers present. At one point, Fulton County elections officials asked us to gather by party and asked both the Democratic Party of Georgia and the Republican Party of Georgia to cull themselves down to 17 credentialed observers. I would estimate the Democratic Party had approximately 30 credentialed observers there so some 13 Democratic Party observers were asked to leave. I do not know how many credentialed observers the Republican party had present, but they were also asked to limit their number to 17.

8. Fulton County officials then came back and asked both the Democratic and Republican parties to limit the number on the floor at any given time to five credentialed observers. Officials noted that county employees had made progress in counting ballots and officials had dismissed approximately two-thirds of the counters, thus less observers were needed on the floor. The same instructions were given to both the Democratic and Republican parties.

9. I was one of the five credentialed observers to remain behind. I was able to walk on the floor where the counting was taking place and observe the two-person teams hand counting ballots. There was nothing extraordinary to note as the county employees looked at ballots, moved the ballots to one of 4 piles and then tallied the votes in each pile. I observed the piles to contain Trump votes, Biden votes and Jorgensen votes. The 4<sup>th</sup> pile was for questionable or undetermined ballots which were placed in an envelope and then someone from the County would retrieve the envelope and take it to the voter review panel. The process was very orderly.

10. I also was able to observe the voter review panels, which were adjudicating ballots containing Presidential votes which the two-person county team could not conclusively determine were meant for a given candidate. At one point, a County official stated that they need additional Republican reviewers for

the voter review panels but could not find any credentialed for that task. Instead the County official allowed two of the credentialed floor observers, both women, to serve on the panel. I observed one of the women chosen for the voter review panel to be taking her own notes during this process. I had also observed this same woman taking photos earlier when she was walking on the floor as an observer and heard a county official ask her to delete the photos and to delete them from the deleted file. This woman was eating, drinking and coughing while reviewing undetermined ballots.

11. I observed two gentlemen arrive who were credentialed for the voter review panel. At that point all parties, Republican observers, Democratic observers, and county officials, agreed to allow the two women to complete the review of ballots as they were almost done.

12. I also at one point observed a press conference with Fulton County officials and saw approximately 10-15 members of the news media in attendance. I also observed individuals and media in the designated general-public observation area.

13. Except for the number limitations imposed equally on both teams of credentialed observers, I did not see or hear of a credentialed observer being denied access to the Recount.

14. While observing, I had access to view each of the two-person audit teams from about six feet away. Some of the two-person teams were discussing audibly the votes and some were simply moving each ballot to a stack of ballots. After the team was finished separating the votes, they would count the number of ballots in each stack and then provide the numbers to be entered into a computer.

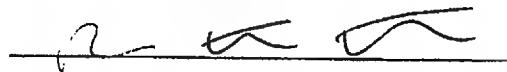
15. I was in the credentialed, ballot-counting area for approximately 4 hours and observed no inaccuracies, improprieties, inconsistencies, or other problems during the Recount. The process ran smoothly.

16. Around 12:10 p.m., after approximately 4 hours of observation, I left the Recount because the voter review panels had essentially wrapped up the work and that had been the focus of my observations.

17. I give this Declaration freely, without coercion, and without any expectation of compensation or other reward.

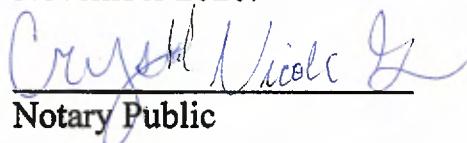
18. I declare under penalty of perjury that the foregoing is true and correct to the best of my ability.

Executed this 17<sup>th</sup> day of November 2020.

 (signed)

Rebecca Hoelting Short

Sworn to and subscribed to  
before me this 17<sup>th</sup> day of  
November 2020.

  
Notary Public

My commission expires:

10/24/2023

